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March 30, 2022

By ECF & Email

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Abuchi Felix*, 21 Cr. 472 (KPF)

Dear Judge Failla:

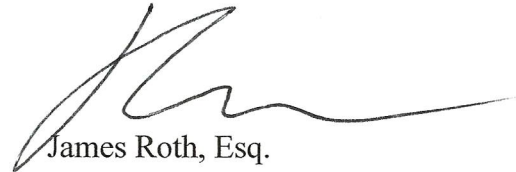
I write to request a modification of Mr. Abuchi's bail conditions to allow him to travel to Beaver Dam, Wisconsin tomorrow, March 31, 2022, for a two-week job training program. Mr. Felix has diligently applied for employment and has secured training through Divurgent LLC, an all-expenses paid job training program with the prospect of extended employment as a technical assistant to health care providers who utilize an EPIC software program. He has been provided a plane ticket for March 31, 2022, accommodations at a hotel, and a per diem of \$240.00 for the duration of the training which commences April 2, 2022, for a two-week duration. The salary is \$38.00 per hour and overtime of \$57.00 per hour. It is not feasible that he participate in the training with an ankle monitor. It is proposed that the conditions of his release be modified to provide that the requirement for electronic monitoring by means of an ankle monitor be removed and that in the alternative, Mr. Felix be required to report to his Pretrial Officer daily during his training period. In the event that Mr. Felix successfully completes his training, counsel will make any additional application required. In the event that Mr. Felix is not retained beyond the two-week period, he will return to his residence and report as previously directed. I have notified Mr. Felix's co-signers about the proposed modification of the bond and they have no objection.

We apologize for the last-minute nature of this application. His recruitment was a fluid process. Mr. Felix has been compliant since his release with all the conditions of his bond. He is currently being supervised in New Jersey by Pretrial Officer Nicholas Zotti.

Pretrial Services consents to this request and the government has no objection to this request and both agree all other conditions of his bond remain in effect.

STAMPUR & ROTH

Very truly yours,



James Roth, Esq.

cc: PTO Josh Rothman (By Email)
PTO Izlia Sanchez (By Email)
PTO Nicholas Zotti (By Email)
AUSA Matthew King (By ECF & Email)
AUSA Micah Ferguson (By ECF & Email)

Application GRANTED. Mr. Felix's bail conditions shall be modified to permit him to travel to Beaver Dam, Wisconsin for the purpose of attending the above-specified job training program. Further, the terms of Mr. Felix's bail shall be modified to permit the removal of his ankle monitor for the duration of the training program and that he report to his Pretrial Service Officer daily for the duration of the program.

The Clerk of Court is directed to terminate the pending motion at docket entry 67.

Dated: March 30, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE